

EXHIBIT K

Emails regarding Fulton County Files

Subject: RE: Fulton Election Project Package for 2020 Recount
Date: Thursday, December 2, 2021 at 6:43:56 AM Eastern Standard Time
From: Bryan Tyson
To: Bruce Brown, Lowman, David
CC: Rob McGuire, Cross, David D., Ascarrunz, Veronica, Marilyn Marks, vrusso@robbinsfirm.com, Carey Miller
Attachments: image002.jpg

Bruce,

We heard back from the Secretary's office late yesterday and they have been unable to locate the requested files in all of the bins where post-election information is returned from counties. If Fulton has some more details about the delivery of those files, that may assist the search, but the Secretary has not been able to locate the requested files.

As to the order, we don't believe this is the proper vehicle under Georgia law to get the requested documents (see OCGA 21-2-500) but don't see that we as the State Defendants have a role in this dispute between the Coalition and Fulton.

Thanks,

Bryan



Bryan P. Tyson

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

[Website](#) | [vCard](#) | [LinkedIn](#) | [Twitter](#)

Ask Me About Our TED Tenet of the Week: Deliver Outstanding Client Service.

Click [here](#) to learn more about our TED Tenets.

[Georgia Legal Awards Litigation Department of the Year](#)

California | Florida | Georgia | Illinois | Michigan | North Carolina | Pennsylvania | Tennessee | Texas | Washington

This communication (together with all attachments) may contain privileged or confidential information, and its sender reserves and asserts all rights that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please notify the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of information periods unless otherwise expressly stated.

From: Bruce Brown <bbrown@brucepbrownlaw.com>

Sent: Wednesday, December 1, 2021 6:47 PM

To: Lowman, David <David.Lowman@fultoncountyga.gov>; Bryan Tyson <btyson@taylorenghish.com>

Cc: Rob McGuire <ram@lawram.com>; Cross, David D. <DCross@mofo.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Marilyn Marks <Marilyn@USCGG.org>; vrusso@robbinsfirm.com; Carey Miller <carey.miller@robbinsfirm.com>

Subject: Re: Fulton Election Project Package for 2020 Recount

David and Bryan,

Marilyn stayed in town the weekend after our November 19 hearing in order to meet with David Lowman and Fulton staff to arrange to obtain the requested files that were subject to the discovery dispute. David and his clients stated that they had delivered a copy of the Recount Election Project files to the Secretary's office after the election and requested that we could obtain the records more promptly given that Fulton in the middle of an election. We have been unable to get any responses since that meeting 10 days ago, other than the response from Bryan saying that the Secretary's office would check again for the Election Project Files.

We will be filing the attached proposed order tomorrow if we have not heard from you by noon that you object to the terms of the order. It is imperative that Coalition experts be given a fair opportunity to analyze these basic election records, most of which have been requested repeatedly since May.

Thanks,

Bruce

From: Bryan Tyson <btyson@taylorenghish.com>

Date: Wednesday, December 1, 2021 at 3:03 PM

To: Coalition for Good Governance <Marilyn@USCGG.org>, "vrusso@robbinsfirm.com" <vrusso@robbinsfirm.com>, Carey Miller <carey.miller@robbinsfirm.com>

Cc: Rob McGuire <ram@lawram.com>, "Lowman, David" <David.Lowman@fultoncountyga.gov>, Bruce Brown <bbrown@brucepbrownlaw.com>, "Cross, David D." <DCross@mofo.com>, "Ascarrunz, Veronica" <VAscarrunz@mofo.com>

Subject: RE: Fulton Election Project Package for 2020 Recount

I have asked and they have not yet located any Fulton recount Election Project Packages. They are still looking and hopefully will have an update soon.

Thanks,

Bryan

Bryan P. Tyson

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

[Website](#) | [vCard](#) | [LinkedIn](#) | [Twitter](#)



Ask Me About Our TED Tenet of the Week: Deliver Outstanding Client Service.

Click [here](#) to learn more about our TED Tenets.

[Georgia Legal Awards Litigation Department of the Year](#)

California | Florida | Georgia | Illinois | Michigan | North Carolina | Pennsylvania | Tennessee | Texas | Washington

This communication (together with all attachments) may contain privileged or confidential information, and its sender reserves and asserts all rights that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of information periods unless otherwise expressly stated.

From: Marilyn Marks <Marilyn@USCGG.org>

Sent: Tuesday, November 30, 2021 4:56 PM

To: Bryan Tyson <btyson@taylorenghish.com>; vrusso@robbinsfirm.com; Carey Miller <carey.miller@robbinsfirm.com>

Cc: Rob McGuire <ram@lawram.com>; Lowman, David <David.Lowman@fultoncountyga.gov>; Bruce Brown <bbrown@brucepbrownlaw.com>; Cross, David D. <DCross@mofo.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>

Subject: Re: Fulton Election Project Package for 2020 Recount

Bryan,

Have you had a chance to ask your client about these files?

We really need to let our experts work with them.

Thanks.

Marilyn

From: Marilyn Marks <Marilyn@USCGG.org>

Date: Monday, November 22, 2021 at 3:48 PM

To: Bryan Tyson <btyson@taylorenghish.com>, "vrusso@robbinsfirm.com" <vrusso@robbinsfirm.com>, Carey Miller <carey.miller@robbinsfirm.com>

Cc: Rob McGuire <ram@lawram.com>, "Lowman, David" <David.Lowman@fultoncountyga.gov>, Bruce Brown <bbrown@brucepbrownlaw.com>, "Cross, David D." <DCross@mofo.com>

Subject: Fulton Election Project Package for 2020 Recount

Counsel,

David Lowman and Fulton staff and I met today to sort out some of the outstanding document discovery. Plaintiffs have not received the Fulton Recount Election Project Package requested back in the spring. The original count package was produced by SOS, I believe. Fulton staff says a recount package copy was delivered to the SOS in December. Given that they are in the middle of an election, it will take several days for Fulton to reproduce a copy of the recount election project package. We agreed that Coalition Plaintiffs would make the request again to you, and request that you ask your client to look for those files. Please let us know whether your clients can locate them promptly and we will figure out the most efficient deliver to our experts.

Thank you.

Marilyn Marks
Executive Director
[Coalition for Good Governance](#)
Cell: 970 404 2225
Marilyn@USCGG.org
Follow me [@MarilynRMarks1](#)